

1 KELLEY DRYE & WARREN LLP
2 Richard DeLossa (STATE BAR NO. 245181)
3 James B. Saylor (admitted *pro hac vice*)
4 10100 Santa Monica Boulevard, Twenty-Third Floor
5 Los Angeles, California 90067-4008
6 Telephone: (310) 712-6100
7 Facsimile: (310) 712-6199
8 rdelossa@kelleydrye.com
9 jsaylor@kelleydrye.com

10
11 Attorneys for Plaintiff Anchor Holdings
12 Limited

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16
17 ANCHOR HOLDINGS LIMITED, an
18 English Limited Company,

19 Plaintiff,

20 v.

21
22 UPPER EAST SIDE SUITES LLC, a
23 Delaware Limited Liability Company,
24 BENEDETTO CICO, an individual, and
25 CARLA CICO, an individual.

26 Defendants.

27
28 **CASE NO. 2:15-cv-05447-MMM-FFM**

29
30 **REQUEST FOR
31 ENTRY OF DEFAULT**

32
33 [Declaration of James B. Saylor and
34 [Proposed] Default by Clerk filed
35 concurrently herewith]

36
37 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

38
39 Plaintiff Anchor Holdings Limited (“Plaintiff” or “Anchor”) hereby requests
40 that the Clerk of the above-entitled Court enter default in this matter against
41 Defendants Upper East Side Suites LLC (“UESS”) and Benedetto Cico pursuant to
42 Federal Rule of Civil Procedure 55(a), on the ground that Defendants UESS and
43 Benedetto Cico have failed to appear or otherwise respond to the Complaint within
44 the time prescribed by the Federal Rules of Civil Procedure.

45
46 As set forth in the Declaration of James B. Saylor (“Saylor Declaration”),

1 filed concurrently herewith, Plaintiff caused the summons and Complaint to be
2 served on Defendants UESS and Benedetto Cico on August 12, 2015, as evidenced
3 by the proofs of service of summons on file with this Court, true and correct copies
4 of which are attached as Exhibit A to the Saylor Declaration.

5 Defendants UESS and Benedetto Cico have failed to appear or otherwise
6 respond within the time prescribed by the Federal Rules of Civil Procedure.

7 The above-stated facts are set forth in the Saylor Declaration filed
8 concurrently with this request. Therefore, the Clerk of the above-entitled Court
9 should enter the default of Defendants UESS and Benedetto Cico in accordance with
10 Rule 55(a) of the Federal Rules of Civil Procedure.

11

12

13 DATED: September 28, 2015 Respectfully Submitted,

14 KELLEY DRYE & WARREN LLP

15 Richard F. DeLossa (STATE BAR NO. 245181)
16 James B. Saylor (admitted *pro hac vice*)

17

18

By //s// James B. Saylor

19

20

Attorneys for Anchor Holdings, Ltd.

21

22

23

24

25

26

27

28

CERTIFICATE OF SERVICE

I hereby certify that on this 28th date of September 2015, the foregoing document and all supporting papers were served via electronic mail on the following Parties:

Upper East Side Suites, LLC
201 Stuyvesant Drive
San Anselmo, CA 94960
Email: cico@usabound.com

Benedetto Cico
201 Stuyvesant Drive
San Anselmo, CA 94960
Email: cico@usabound.com

//s// *James B. Saylor*

James B. Saylor